

Central Valley Project Water Association
1151 "I" Street
Sacramento, CA 95814

January 6, 1997

CalFed Bay Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814
Attention: Mr. Dick Daniel

Dear Mr. Daniel:

The purpose of this letter is to comment on the Preliminary Working Draft of the CalFed Bay-Delta Program Ecosystem Restoration Program Plan, Implementation Objectives and Targets (ERRP) presented at the January 3, 1997 meeting in Sacramento, California.

The ERRP states "an implementation objective is the most specific and detailed description of what program will strive to maintain or achieve for an ecosystem element" and that "implementation objectives are not intended to change over the life of the program". The relationship between implementation objectives require further definition. Specifically, the ERRP must be clear and articulate implementation objectives of ERRP and elucidate the relationship between ecosystem quality objectives presented in Table 1. It is confusing to determine what the objectives of the ERRP are, because of the presentation of multiple list of objectives. A link between ecosystem quality objectives presented in Table 1 which include improvement and increase of aquatic habitat, wetland habitat increase and population health and population size of Delta species to insure sustained survival should be incorporated with implementation objectives presented in Table 9. When reading Table 9 it is easy to confuse implementation objectives with actions. By definition implementation objectives are not intended to change, however, because of the descriptive verbs restore, enhance, maintain are used throughout the table, it easy to associate objectives with specific actions. Consolidation of objectives will allow for a better understanding of ERRP objectives and the subsequent relationship between proposed targets and actions of the ERRP.

The ERRP states that "a target is a qualitative and quantitative statement of an implementation objective" and "can change over the life of the program with new information and progress". Targets may vary with storage and conveyance alternatives and can be set to the amount of specific habitat restored or abundance of distribution of species. Targets are typically orientated toward actions and can be measured to assess if they are successfully achieved and may be summarized as a proposed value of an ecosystem element. The relationship between targets which can change and implementation objectives which do not change must be elucidated in the next draft of the ERRP.

For example, the ERRP recommends a target to: establish desirable water temperatures during summer and fall-base flow periods and low-flow springs of drier years in tributaries and mainstem rivers. In this case, the target may be a temperature point such as 56 degrees F at specific reaches in the mainstem river. The appropriate actions to facilitate temperature control may involve reservoir management and or releases that address identified secondary ecosystem processes and functions and ultimately meet ecosystem quality objectives to improve and increase aquatic habitats. Since temperature targets are particularly difficult to meet in our example during summer and are dependent on primary physical processes as annual hydrograph and operation of man made facilities, it is important to confirm how this action and others of the ERRP will be assessed in relation to meeting ERRP objectives. In summation, the fundamental concerns upon review of the ERRP to date, are to ensure that ERRP identifies proposed actions and that specific actions are linked to all measurable

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targets and that targets address implementation and ecosystem quality objectives of the ERRP. The ERRP must be explicit of defining what is to be considered successful in meeting ERRP objectives and whether or not actions are leading to solutions.

Thank you for the opportunity to provide our preliminary comments as they relate to the ERRP.

Sincerely,



Serge Birk

Fisheries Biologist